

# **EXHIBIT T**

Jaz

26 February 2020

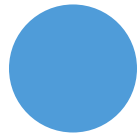


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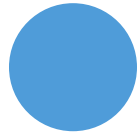
Lisa Reynolds Barbounis 19.10.2019 16:35:04



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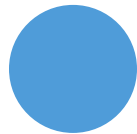
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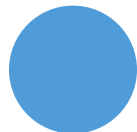
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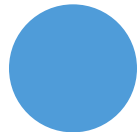
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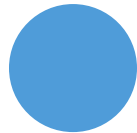
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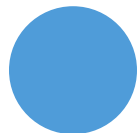
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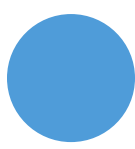
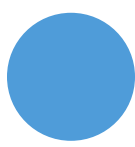
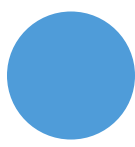
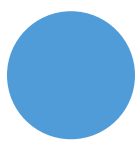
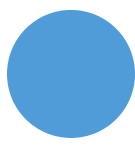
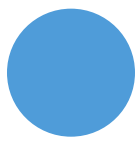
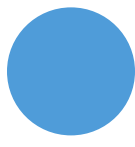
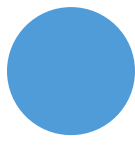

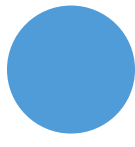
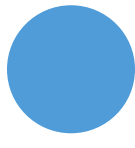

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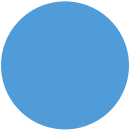
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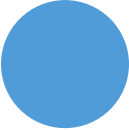
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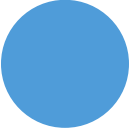
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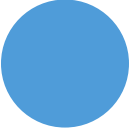
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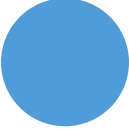
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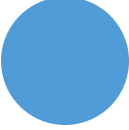
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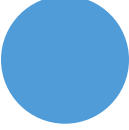
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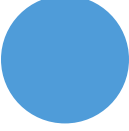
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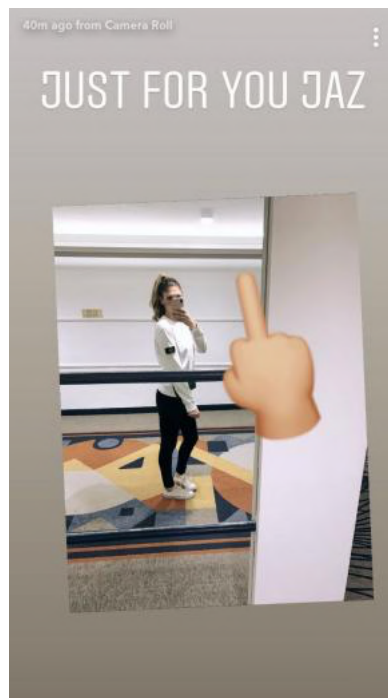
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**Jaz** 19.10.2019 15:18:38

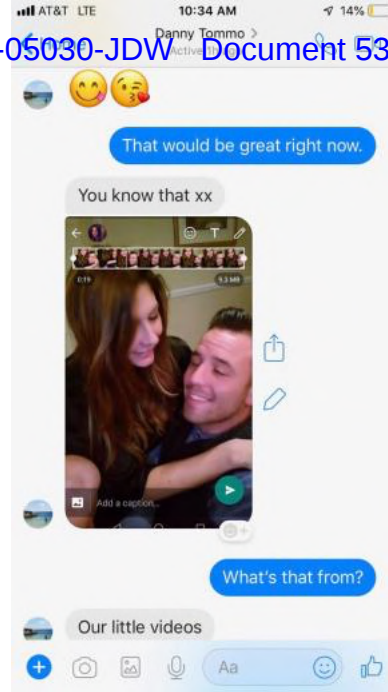


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**Jaz**

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**Lisa Reynolds Barbounis** 19.10.2019 15:54:30



# **EXHIBIT U**



This article is more than **1 year old**

## Anti-Islam activists get key roles in 'family-friendly' Brexit march

**Roles go to 'proudly anti-Islam' Avi Yemini and YouTuber Carl Benjamin, who sent rape tweet to Labour MP**

**Josh Halliday** *North of England correspondent*

Fri 7 Dec 2018 11.00 EST

A “proudly anti-Islam” Australian activist and a YouTuber who sent a rape tweet to a Labour MP have been handed prominent roles at a “family-friendly” Brexit rally due to take place in London on Sunday, the Guardian has learned.

Avi Yemini, who described Islam as a “barbaric ideology” that had taken over England and described Muslim countries as “Islamic sh\*\*holes”, has flown from Australia to cover the event on social media at the invitation of Tommy Robinson, the activist who is organising the event alongside the Ukip leader, Gerard Batten.



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Yemini's attendance is being funded through online donations in partnership with the Canadian far-right website the Rebel Media, which previously employed Robinson.

Ukip has insisted the rally will be a family-friendly demonstration against what it called "the great Brexit betrayal" being pursued by Theresa May's government. But the Guardian has learned that one of the key confirmed speakers is a man who has accused opponents of "acting like a bunch of [N-word]" and sent a rape tweet to the Labour MP Jess Phillips.

Carl Benjamin, 39, who uses the alias Sargon of Akkad, is a political commentator who has gained more than 860,000 subscribers on YouTube by making videos criticising feminism, Islam and political correctness. He joined Ukip in June as part of the party's attempt to attract internet-savvy supporters.

The prominent roles of both men at the rally will alarm those inside Ukip who have expressed growing unease about the party's relationship with Robinson and his associates.

Nigel Farage quit Ukip this week after 25 years, blaming its anti-Muslim "fixation", while the former deputy chair Suzanne Evans, the former leader Paul Nuttall, and MEPs Patrick O'Flynn, Bill Etheridge and William Dartmouth have also quit following Batten's decision to appoint Robinson as an adviser.

Robinson, whose real name is Stephen Yaxley-Lennon, has been raising funds for this Sunday's "Brexit Betrayal" rally by emailing supporters directly, asking for donations towards the £8,000 cost of stage and sound equipment.

Several members of Batten's inner circle are closely involved with organising the rally, which is due to begin outside the Dorchester hotel and end outside Downing Street. Robinson posted a picture on Instagram from a planning meeting last week which showed the Ukip leader alongside his personal assistant, Liz Phillips, his adviser Lawrence Webb, and the party's head of communications, Kris Hicks.



A meeting of the 'Brexit Betrayal' rally organisers in late November. Photograph: Handout

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A senior executive of the Middle East Forum, an influential US thinktank which helped bankroll Robinson's legal fight and protests, was also at the meeting and has been closely involved in rally preparations, the Guardian has learned.

Lisa Barbounis, the executive liaison officer to the MEF president, Daniel Pipes, is expected to attend the rally. She previously addressed crowds outside the Old Bailey after Robinson's most recent court appearance.

A Ukip spokesman confirmed Barbounis' involvement in the meeting and said she was "just recording the meeting to report back to them [the Middle East Forum]". He said the MEF were "very interested in the topic Tommy Robinson discusses and Brexit and the future prospects of the country".

However, Pipes denied the forum was "in any way connected" to the Brexit rally. Barbounis was in London "on her own initiative and attended the planning meeting in a personal capacity", he said.

One senior Ukip insider described the rally as "crazy" and said 200 members had quit the party on Friday night in protest at its association with Robinson. "If it all goes wrong, and I think it will, then Gerard should walk or be pushed," the insider said.

Benjamin gained notoriety in 2016 when he was accused of instigating a misogynistic trolling campaign against Phillips, the Labour MP for Birmingham Yardley. "I wouldn't even rape you," he tweeted at Phillips, reportedly prompting hundreds of threatening tweets against her, including rape and death threats from his followers. He has since been banned from Twitter.

In a livestream recorded in February, Benjamin appeared to lose his temper at commenters. "You are acting like a bunch of [N-word], just so you know. You act like white [N-word]," he said. Benjamin insisted his comments had been taken out of context.

Yemini, who describes himself as "proudly anti-Islam", gained more than 100,000 followers on Facebook after posting inflammatory videos, before being banned from the social network earlier this week.

The Israeli-born activist says he was a sniper in the Israeli Defence Forces and that he served in the Gaza Strip. He is standing in upcoming elections for the far-right Australian Liberty Alliance party, which has acknowledged donating to Robinson in the past.

His arrival in Britain was welcomed by Daniel Thomas, who was jailed for two years in 2016 for attempted kidnap and is organising the rally with Robinson and Ukip. He posted a picture of Yemini on social media with the message: "My favourite Nazi Jew Avi has arrived #SundayFunDay #TheGreatBetrayal".

## **America faces an epic choice ...**

... in the coming months, and the results will define the country for a generation. These are perilous times. Over the last three years, much of what the Guardian holds dear has been threatened - democracy, civility, truth.

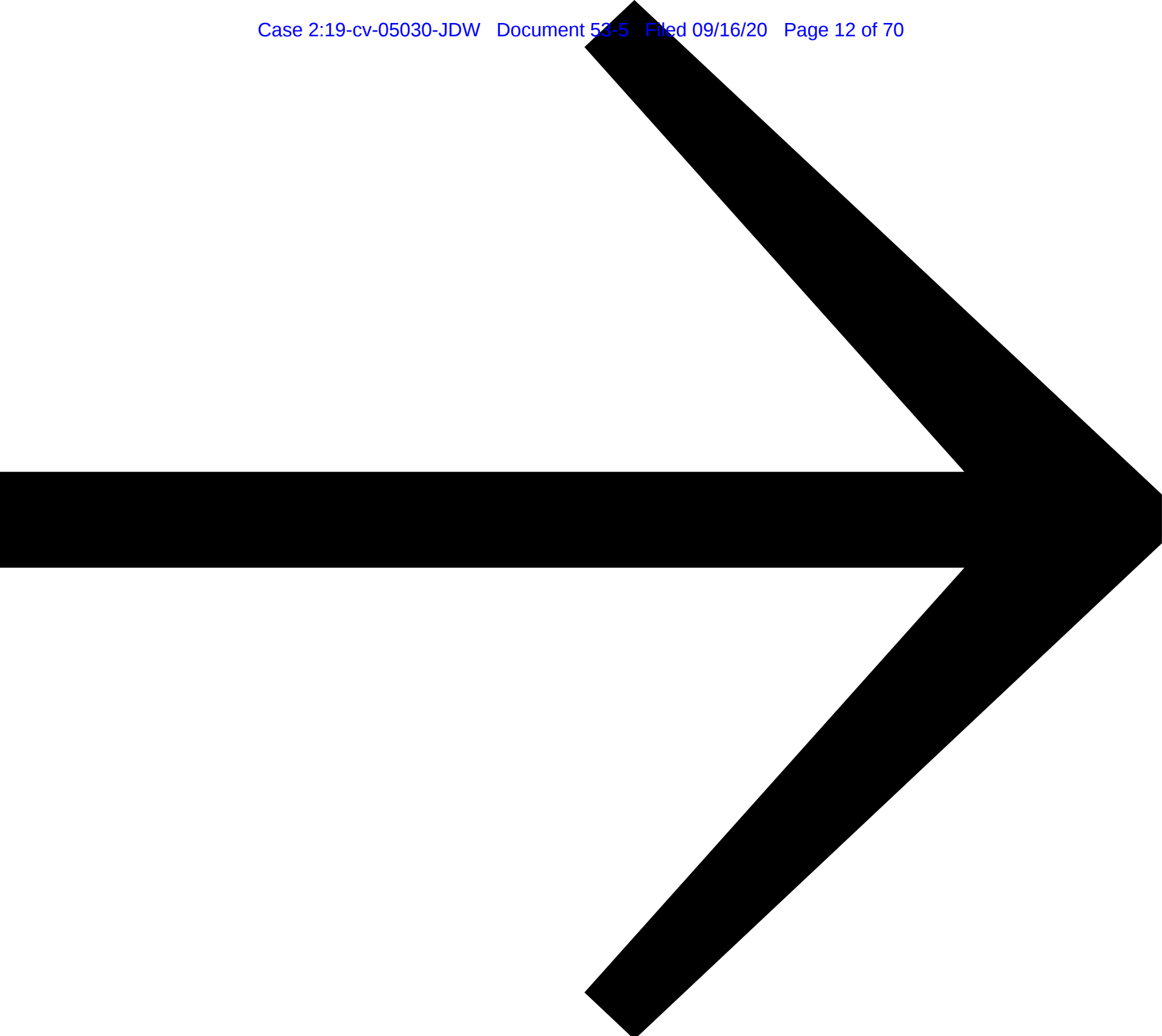
The country is at a crossroads. Science is in a battle with conjecture and instinct to determine policy in the middle of a pandemic. At the same time, the US is reckoning with centuries of racial injustice - as the White House stokes division along racial lines. At a time like this, an independent news organisation that fights for truth and holds power to account is not just optional. It is essential.

The Guardian has been significantly impacted by the pandemic. Like many other news organisations, we are facing an unprecedented collapse in advertising revenues. We rely to an ever greater extent on our readers, both for the moral force to continue doing journalism at a time like this and for the financial strength to facilitate that reporting.

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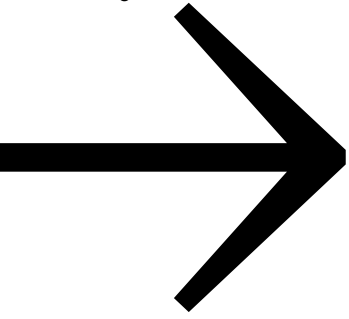


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# **EXHIBIT V**

**To:** Lisa Reynolds-Barbounis[Barbounis@meforum.org]  
**Bcc:** Gregg Roman[Roman@MEForum.org]  
**From:** Daniel Pipes[pipes@meforum.org]  
**Sent:** Mon 4/15/2019 10:48:22 PM (UTC)  
**Subject:** DC

Lisa,

Going over the PD call today with me, Gregg mentioned you're going to DC tomorrow.

I have two concerns. You did not clear this with me. It seems to me that you're getting too caught up with the Europe topic at the expense of your internal MEF work.

Your response?

# **EXHIBIT W**





**Jazmin**

@jaz\_bishop

Are you aware that Lisa was an possibly  
still is having an affair with Danny tommo

I have all the evidence feel free to ask an  
I will send it to

May 6

Do you want to allow Jazmin to message you? They won't know you've  
seen their request until you choose to accept. [Flag conversation](#)

**Delete**

**Accept**

# **EXHIBIT X**



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# Man who threw milkshake on Tommy Robinson is now getting death threats

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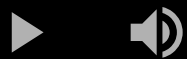
**Jimmy Nsubuga**  
Sunday 5 May 2019 10:25 am



4.6k  
SHARES

Tommy Robinson gets milkshake thrown over him again





0:00 / 0:25

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## **A man, 23, who poured milkshake over far-right activist Tommy Robinson has had his life threatened over the incident.**

Anti-fascist protester Danyaal Mahmud says he fears for his safety after he was targeted when a video showing him attacking Robinson (real name Stephen Yaxley-Lennon) was shared online.

The video also showed Mr Mahmud, from Blackburn, being assaulted by Robinson's entourage after he had thrown the McDonald's drink in Warrington last Thursday.

He **told** The Observer: 'I'm a low-key person, I didn't anticipate this publicity and I don't want it – I'm getting death threats on social media and I am worried about me and my family being targeted.'





Anti-fascist protester Danyaal Mahmud threw milkshake over Tommy Robinson (Picture: Newsflare)





**Danyaal Mahmud, 23, who threw milkshake over Tommy Robinson (Picture: SWNS)**

Mr Mahmud said he threw the milkshake over English Defence League founder Robinson, 36, as an 'instant reaction' after he had been approached by him and shouted at by others earlier in the day.

He added: 'He asked me if I thought he was racist and I said: "Yeah". Then he says: "Do you know 80% of grooming gangs are Muslim?"'

Mr Mahmud said Robinson didn't like it when he disputed the statistic and pointed out white paedophiles were not referred to as Christian grooming gangs.

The two met up again later and that is when the milkshake incident happened.

Mr Mahmud, who admitted he called Robinson 'scum', added: 'I said to him [Robinson] I do not wish to speak to you on or off camera. I just got annoyed with him. A milkshake 'slipped' out of my hand.'

Robinson's spokeswoman Lisa Reynolds said Mr Mahmud's claims were false, adding: 'Tommy

encourages his supporters to remain peaceful in the face of adversity and report any mischief to the police.

‘Tommy discourages mischief and should be able to operate a political campaign without being attacked by organised agitators.’

**MORE: Pregnant mum killed in Gaza airstrikes after Israel responds to rocket attacks**



Mr Mahmud was attacked in retaliation Picture: Newsflare)





Tommy Robinson after he had the milkshake poured on him Picture: Newsflare)

Mr Mahmud suffered bruises, cuts and a minor injury to the head after he was hit in retaliation.

He reported what had happened to the police, who confirmed they had received an allegation of

Despite all the acrimony, Mr Mahmud said he'd be willing to 'bury the hatchet' with Robinson and they could 'shake on it'.

Greater Manchester Police added: 'GMP has a proven track record in effectively policing public events and we are prepared to take action against those who would seek to engage in disorder.'



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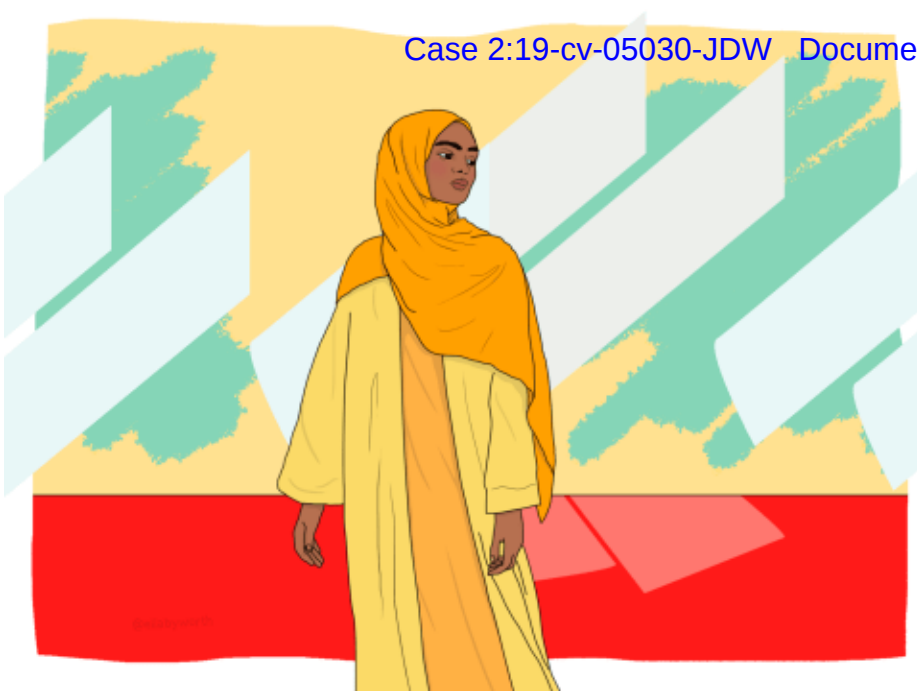
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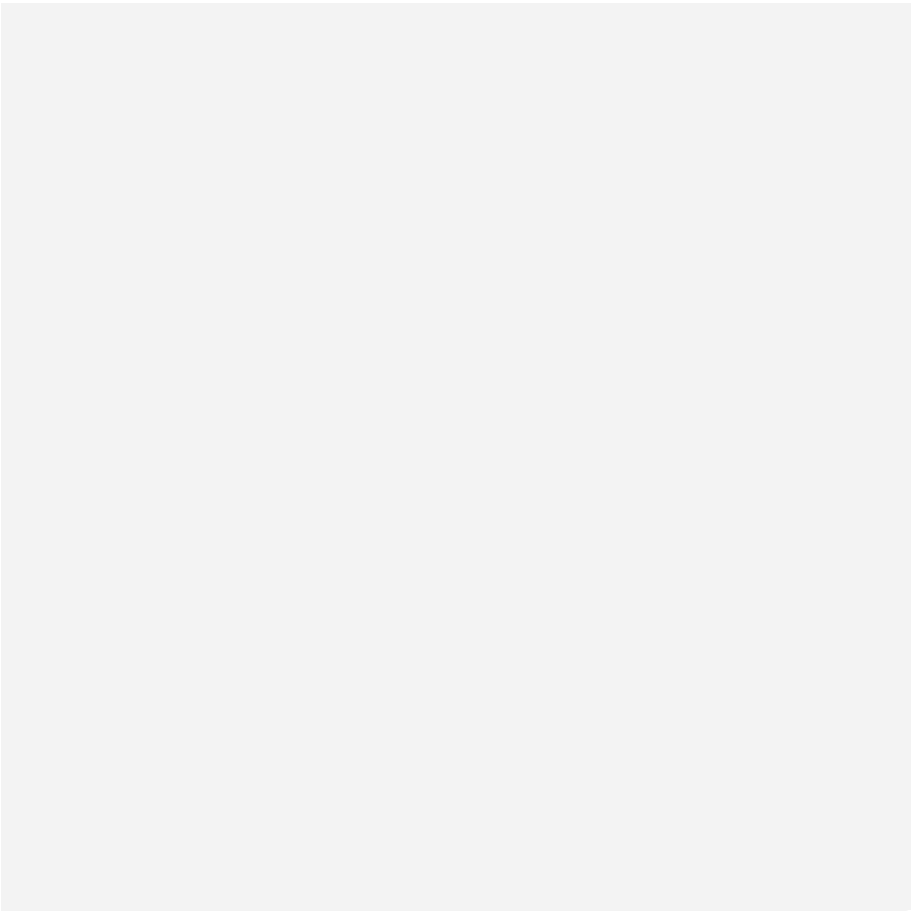
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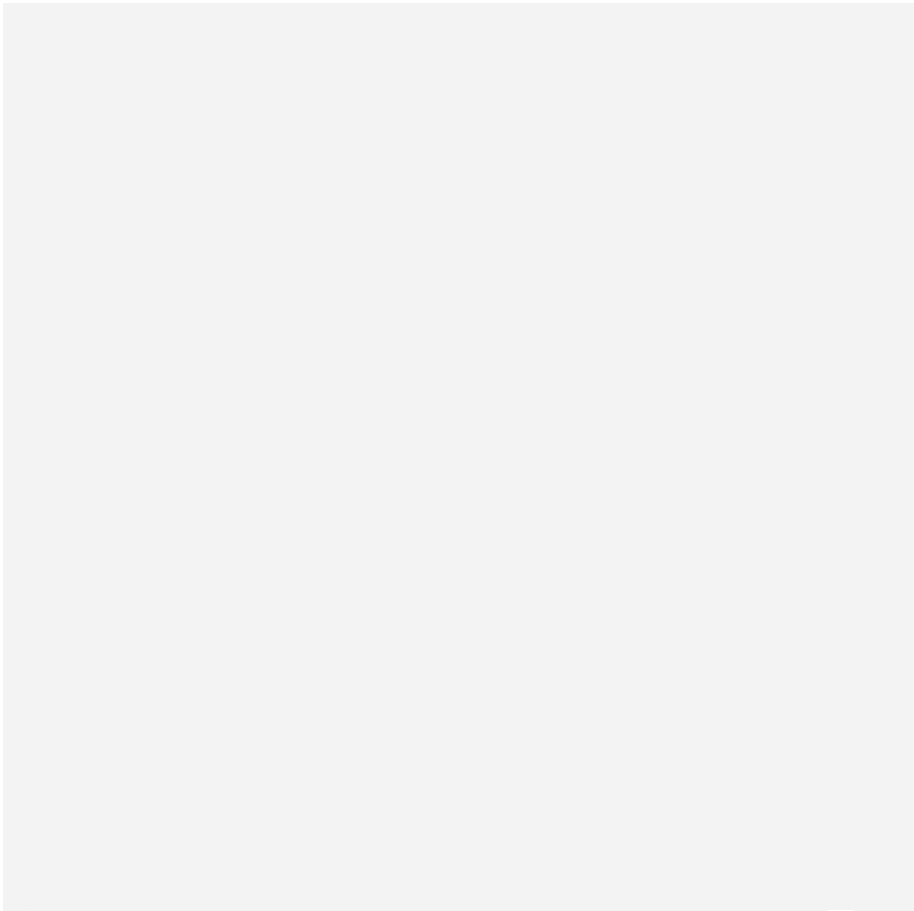
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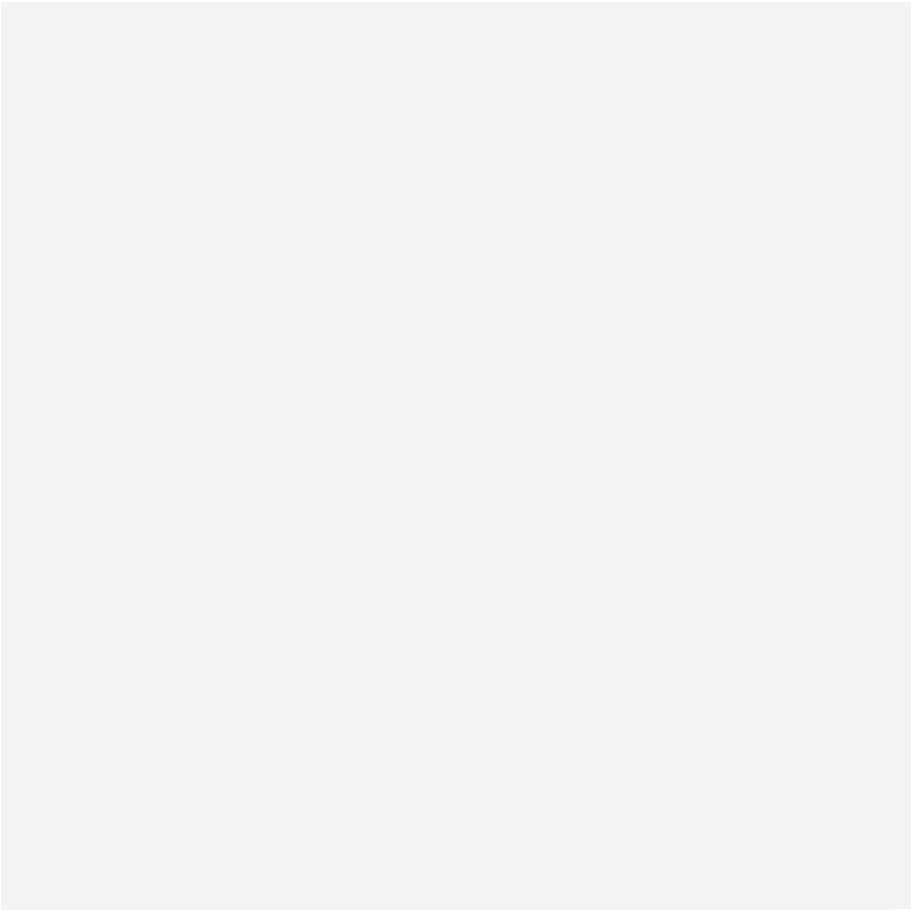
VIDEO



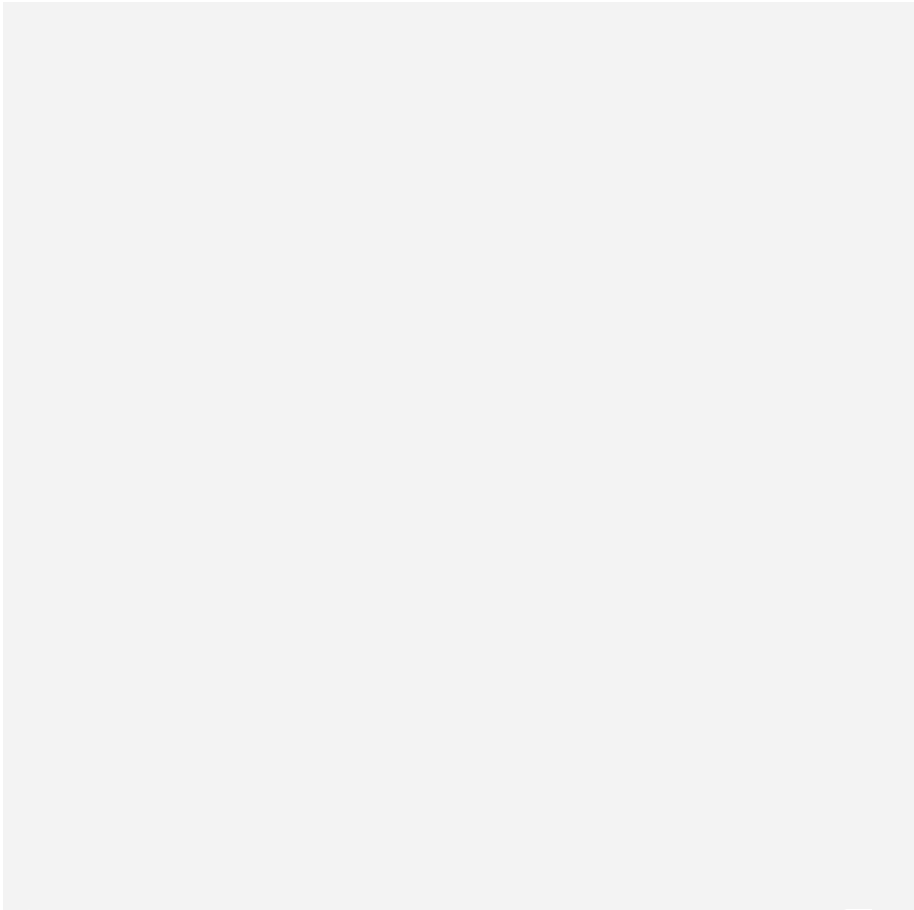
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# **EXHIBIT Y**





# 'Punches, attacks, milkshakes': inside the Tommy Robinson campaign

As the far-right activist fights to become an MEP, the Guardian learns new details of his modus operandi and support network

**Josh Halliday and Simon Murphy**

Fri 17 May 2019 11.43 EDT

**A** drone hovers high above the crowd on a Wigan housing estate. About 300 men, women and children are gathered before a mobile billboard on a sun-drenched spring evening. A cheer erupts when the main speaker arrives.

Waving a St George's flag, Tommy Robinson wants the crowd to send a deafening message to "treacherous politicians" and vote him into the European parliament on 23 May. "I am one of you," he shouts across the estate. "They don't breathe the same air as us. They do not care about us. But I can guarantee you: I am one of you."



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The far-right anti-Islam activist, whose real name is Stephen Yaxley-Lennon, has delivered the same speech countless times on a chaotic and ugly campaign across the north-west of England. On the Norley Hall estate, one of Wigan's most deprived neighbourhoods, Robinson addressed one of his biggest crowds of the tour.



Robinson in Wythenshawe, Greater Manchester, last month.

Photograph: Christopher Furlong/Getty Images

“Right now, can anyone say our country is going in the right direction?” he asks. “No, it’s turning into fucking Tehran!” shouts back an activist handing out flyers and membership forms for the far-right party For Britain. Although Robinson is officially an independent candidate, and an adviser to the Ukip leader, Gerard Batten, For Britain has pledged its support to his campaign.

There has been a more surprising presence at Robinson’s rallies, however: Lisa Barbounis, a senior executive of the conservative US thinktank the Middle East Forum, has been a central figure on Robinson’s campaign team and present at many of his rallies, the Guardian has learned. Her exact role is unclear but Barbounis, who says she has worked on several Republican campaigns including John McCain’s run for president in 2008, has been on the trail with Robinson for about a fortnight. The Philadelphia-based group, which is well funded by a number of US rightwing donors, says its goal is to defend “anti-Islamist authors” and last year spent tens of thousands of pounds on Robinson’s demonstrations and legal fees when he was jailed for contempt of court.



Lisa Barbounis at a Tommy Robinson rally in Warrington.  
Photograph: Joel Goodman/The Guardian

The Middle East Forum said it continued to pay Robinson's legal fees but had not contributed to his campaign, which would be in breach of electoral law. It said Barbounis was "on vacation in the UK" and spending her "personal time and personal expense" on the campaign.

There has been outside help, too, from Robinson's former employer, the rightwing Canadian website Rebel Media, which said this week that it had paid for the Israeli-Australian commentator Avi Yemini to fly from Melbourne to cover his campaign. Yemini, who was recently denied entry to the US, has described Islam as a "barbaric ideology" that has taken over England and called Muslim countries "Islamic shitholes". Yemini is little known in the UK but has been ever-present at Robinson's rallies, often as a warm-up act on stage or in videos taking aim at critics of the would-be MEP. His recent videos promoting Robinson include "PROOF: Tommy Robinson PROTESTORS are just PAID thugs" and "CONFIRMED: Tommy Robinson 'protestors' are cowards".

Robinson's international supporters stand in stark contrast to the deprived estates of Manchester, Stockport, Bolton, Cumbria and Wigan where he has focused his campaign, drawing crowds of between 50 and 300. Political rivals are split on whether he has a genuine chance.

If turnout is low, he may need just 8% of the vote to be the first MEP in Britain elected as an independent - a possibility keenly apparent to the main political parties, which recall the election of the BNP's Nick Griffin in the north-west with just 8% of the vote in 2009.

"He will do very badly - he's not got a chance of being elected," said one MEP privately. Another believed he could win if Brexit-weary voters decided to stay at home: "One of the biggest worries is apathy - people saying they're not going to vote." Those fears - that a low turnout could help anti-European insurgents - are echoed across the continent amid forecasts of historic gains by populist parties such as Nigel Farage's Brexit party.



Robinson poses for a selfie with supporters. Photograph: Joel Goodman/The Guardian

The election of Tommy Robinson MEP would cap a once-unthinkable rise for the convicted football thug, who started leading nationalist street protests in his hometown of Luton a decade ago. He became a global cause célèbre for the far right last year when he was imprisoned for three months over a broadcast that allegedly risked prejudicing a child sexual exploitation trial in Leeds – a conviction that was eventually overturned but will be retried at the Old Bailey in July.

While Robinson regularly complains of being smeared as a racist and a Nazi, he has been filmed saying things like: “Somalis are backward barbarians”; British Muslims are “enemy combatants who want to kill you, maim you and destroy you”; and refugees are “raping their way through the country”.

In remarks unearthed by the Guardian, Robinson told a meeting of far-right activists in Cork in



2016 that the west was “too weak to say our culture is superior to Muslim culture” and - in comments picked up off-camera - told one rightwing campaigner it was fine to use violence against counter-protesters as long as it was not on camera. “If the cameras aren’t there, fucking punch the geezers right in the head,” he said, adding that being seen to be aggressive “just turns people off”. “You want to be seen as the victims - people viewing you like: ‘Fucking hell, look how they’re getting treated. Give them a chance’ - you know what I mean?” The unguarded remarks were made during filming for an RTÉ documentary, I Am Immigrant, which has never aired in Britain.

Robinson’s chequered history with the law does not prevent him standing for the European parliament. The 37-year-old father of three has at least five convictions for violence and public order offences from 2005 to 2014, and has served prison sentences for using a false passport and a £160,000 mortgage fraud.

On his campaign trail, Robinson has been surrounded almost permanently by a security team and his own film crew. He is keenly aware he will be scrutinised whenever he is on camera - but the mask occasionally slips.

The footage of Robinson being doused with milkshake in Warrington became a viral sensation. In the aftermath, he could be seen throwing a volley of punches at the assailant, who Robinson’s team pounced on. The incident sparked chaotic scenes, currently being investigated by Cheshire police, when two anti-racism protesters were punched to the ground leaving them needing hospital treatment. Alice Edwards, one of the victims, said she was punched in the face by Danny Thomas, Robinson’s campaign organiser, and suffered a broken nose. Thomas has not denied the incident but claimed Edwards was “attacking our team”, which she disputes.

The Guardian has learned that the man who filmed the milkshake incident has been receiving police protection after a far-right activist threatened to pass his and his parents’ contact details and address to “the most far-right groups online”. Police placed an urgent response marker on the homes of David, who was afraid to give his surname, and his father following threats made online by a former BNP parliamentary candidate. The 31-year-old bar worker, from Wigan, said: “I’ve been told by police to keep my door locked and get a basket for my letterbox in case someone tried to put anything fire-related through it. It’s quite intimidating.”

Robinson was quick to use the milkshake incident to rile his supporters. In a video later that day to his 40,000 followers on the encrypted app Telegram, where he was forced to turn after being banned by the major social networks, Robinson claimed he was “politically targeted ... and the police have done fuck all”, urging viewers to “get angered with what they’re watching”. He added at the end of the clip: “Ah mate, I so wanna win this. No amount of punches, milkshakes, attacks or anything’s gonna stop me. I’m coming to every city ...”

After posting the video, he wrote on Telegram: “Shake it up baby! Comments here.” His followers responded with more than 700 comments, including many that attacked Muslims including referring to the milkshake-thrower as a “paki”. One user wrote: “Muslims need eradicating from UK probably sounds a bit harsh but they have raped this country and its citizens for the last 30 years disgusting uk gov corrupt paedophiles.”



Supporters of Robinson in central London last year. Photograph: Daniel Leal-Olivas/AFP/Getty Images

Another commenter called Muslims “cowards” and “inbreds”. A supporter also said they were “sick of these Islamic appeasing left extremist groups” which he said were “all funded by Soros”, referencing the Jewish financier George Soros, who is often the target of antisemitism. Another follower said the man who threw the drink represented “spot on the attitude of the typical Muslim teenager throughout the UK, absolutely zero respect”.

In response to a series of questions from the Guardian, Robinson said: “You are fake news.”

While he does not acknowledge responsibility for his supporters’ behaviour, on the campaign trail he has sometimes revelled in their shared agenda. “I am one of you,” he told supporters on the Norley Hall estate. “I’ve made mistakes like all of you. I’ll make more ... [but] I can guarantee you one thing: we are building a movement.”

## **America faces an epic choice ...**

... in the coming months, and the results will define the country for a generation. These are perilous times. Over the last three years, much of what the Guardian holds dear has been threatened - democracy, civility, truth.

The country is at a crossroads. Science is in a battle with conjecture and instinct to determine policy in the middle of a pandemic. At the same time, the US is reckoning with centuries of racial injustice - as the White House stokes division along racial lines. At a time like this, an independent news organisation that fights for truth and holds power to account is not just optional. It is essential.

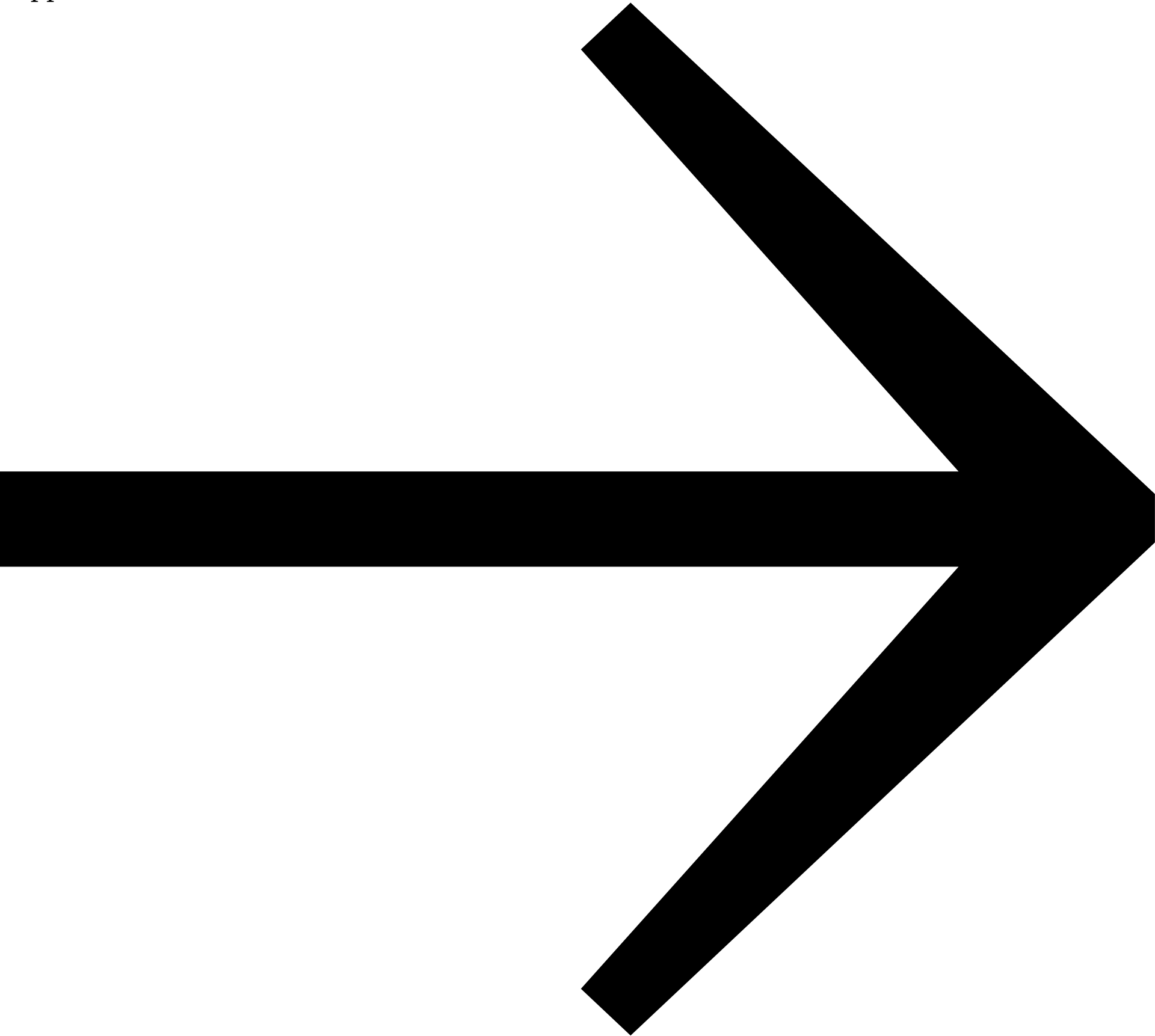
The Guardian has been significantly impacted by the pandemic. Like many other news organisations, we are facing an unprecedented collapse in advertising revenues. We rely to an ever greater extent on our readers, both for the moral force to continue doing journalism at a time like this and for the financial strength to facilitate that reporting.

We believe every one of us deserves equal access to fact-based news and analysis. We’ve decided to keep Guardian journalism free for all readers, regardless of where they live or what they can afford to pay. This is made possible thanks to the support we receive from readers across America in all 50 states.

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As our business model comes under even greater pressure, we'd love your help so that we can carry on our essential work. **If you can, support the Guardian from as little as \$1 - it only takes a minute. Thank you.**

☐ Support The Guardian



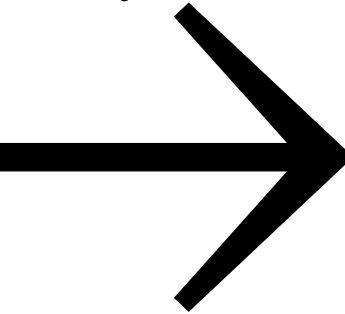
Remind me in September





Remind me in September  
Email address

Set my reminder



We will use this to send you a single email in September 2020. To find out what personal data we collect and how we use it, please visit our [Privacy Policy](#)

We will be in touch to invite you to contribute. Look out for a message in your inbox in September 2020. If you have any questions about contributing, please contact us [here](#).

Topics



- Tommy Robinson
- The far right
- European parliamentary elections 2019
- European elections
- Race
- features

# **EXHIBIT Z**



**From:** Daniel Pipes  
[pipes@meforum.org]  
**Sent:** 5/28/2019 9:42:21 PM  
**To:** Lisa Barbounis  
[Barbounis@meforum.org]  
**Subject:** Job review

This message was sent from outside the company by someone with a display name matching a user in your organisation. Please do not click links or open attachments unless you recognise the source of this email and know the content is safe.

Lisa,

1. In my April 16 note to you, I wrote "Please don't surprise me with your travels." But then it turns out the *Guardian* had a mole who spotted you at three separate Tommy Robinson rallies; that definitely counts as a surprise. From now on, you need express permission from me before engaging in MEF travel and you must also clear with me any personal travel that includes a political agenda.
2. I found out a few weeks ago that since you became communications director, and until it was pointed out in a phone call, that articles were not being sent to the Islamist Watch and Campus Watch mailing lists. Have we resumed sending articles to these lists? Why was there a six month lapse in articles not being sent out?
3. Gary and Delaney between them seem to have replaced you with the article **evaluation process, social media** and MEFO administration. I suggest we formalize this arrangement.
4. I do not notice an improvement in staff and fellow publications. So far as I know, we have not been contacted by editorial boards and your meetings with reporters have not generated quotations. More broadly, our public stature has not improved.
5. Conference calls have stopped since we ended Marilyn's role.
6. Your last weekly report to me was on April 22.
7. Videos have appeared on YouTube, but too few.
8. On April 17, I wrote you (below) "I am not convinced that you are focused on the tasks we agreed upon back in November, such as tending to MEFO and cultivating editors to improve our publishing

record. Please show me that you are." Forty days have gone by; can you establish how you have done so?

On Wed, Apr 17, 2019 at 3:48 AM Daniel Pipes <[pipes@meforum.org](mailto:pipes@meforum.org)> wrote:

Lisa,

A few responses:

1. You went to DC for activities basically unrelated to MEF's mission.
2. DC has a lot of editors, MEF staff, and MEFEF grantees; they are who you should be focused on.
3. I doubt if Posobiec is someone for us to associate with.
4. Please don't surprise me with your travels, starting with indications on the calendar.

More broadly, I am not convinced that you are focused on the tasks we agreed upon back in November, such as tending to MEFO and cultivating editors to improve our publishing record. Please show me that you are.

On Tue, Apr 16, 2019 at 9:34 AM Lisa Barbounis <[Barbounis@meforum.org](mailto:Barbounis@meforum.org)> wrote:

Dr. Pipes,

I met up with Jack Posobiec over the weekend and he asked to have Sydney Watson, a friend, on OANN. As such he invited me to the studio. I took that as an opportunity for me meet people there so that we (MEF) can build relationships with them and eventually have them book MEF staff/fellows. It has nothing to do with anything in Europe. This is why I brought it up on the project directors call.

My apologies for not clearing it with you. I was treating it as a work from home day. The OANN time is at 1pm which I was considering a lunch break. I have been working on MEF responsibilities since 8:30am and plan to work the entire day.

**From:** Daniel Pipes <[pipes@meforum.org](mailto:pipes@meforum.org)>  
**Sent:** Monday, April 15, 2019 6:49 PM  
**To:** Lisa Barbounis  
**Subject:** DC



Lisa,

Going over the PD call today with me, Gregg mentioned you're going to DC tomorrow.

I have two concerns. You did not clear this with me. It seems to me that you're getting too caught up with the Europe topic at the expense of your internal MEF work.

Your response?

# **EXHIBIT AA**

**From:** Daniel Pipes  
[pipes@meforum.org]  
on Daniel Pipes  
behalf <pipes@meforum.org>  
of [pipes@meforum.org]  
**Sent:** 6/5/2019 8:16:26 PM  
**To:** Lisa Reynolds-Barbounis  
[Barbounis@meforum.org]  
**Subject:** campaign work

This message was sent from outside the company by someone with a display name matching a user in your organisation. Please do not click links or open attachments unless you recognise the source of this email and know the content is safe.

(I wrote this 2½ weeks ago but incessant travels delayed my sending it to you until now)

Lisa,

The Guardian article from May 17 has a long, insinuating paragraph about you along with a picture of you. The clear implication is that MEF supports Tommy Robinson's campaign.

This rates as both a surprise and an unwelcome complication. The article could entirely disappear but it could also pop up in the future and make trouble for us. I do not want potential trouble hanging over us, so am displeased.

You and I have already discussed the matter of your affiliating MEF too closely with Tommy Robinson and we reached an informal agreement that you would stay away from his efforts. Given this development, I am now imposing a formal limitation on you: No campaign work, even during your private time, without clearance from me.

Please reply to me with your response.

Daniel

# **EXHIBIT BB**

practices.

*"Jefferies: What gives anyone the right to tell anyone where they can and can't live?"*

*Yemini: Borders?"*

*Jefferies: I know borders, but wouldn't it just be nice if we got to a place in society, a utopia where we all just commit to this one idea?"*

*Yemini: I think most sensible people would agree with you in theory, but in practice, it goes against human nature, it just doesn't work."*

Yemini, "We are seeing a rising effort to silence anyone that disagrees with the main stream media narrative. They will do everything in their power to discredit you, even if it means blatantly lying to the general public."

The underlying and crucial message to be taken away from this blatant act of deception is to be mindfully critical of the liberal media we consume. This instance is just one of many where any message counter to the main stream is altered to fit their calculated narrative of misconstruing conservative activists' ideas into extreme rhetoric, even if they have to create this rhetoric themselves.

**For immediate release**  
For more information, contact:  
Lisa Barbounis  
[Press@tr.news](mailto:Press@tr.news)  
+1 (215) 910-2154

# EXHIBIT CC



with appointed judge Dame Victoria Oughton [admitting](#) she intended to make an example out of Robinson, the message is clear. The UK government and the globalist media are determined to sweep the Muslim pedophile grooming gang epidemic, and any robust conversation regarding Islam, under the carpet. All attempts to highlight the realities of Islam that counter their globalist agenda will be met with the full force of the law, regardless of innocence.

This is undeniably political persecution. Tommy Robinson is a political prisoner and we are all witnessing the erosion of the justice system that once made this country great; all at the hands of the globalist agenda.

**For immediate release**  
For more information or comment, contact:  
Lisa Reynolds,  
Director of Communication  
TR.News  
+44 01253670806

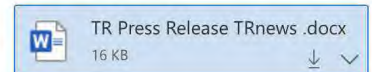
TRW.

① You replied on Tue 7/16/2019 2:28 PM



**Lisa Barbounis** <[lisa@barbounis.com](mailto:lisa@barbounis.com)>

Tue 7/16/2019 12:54 PM  
Lisa Barbounis



Sent from my iPhone

Begin forwarded message:

**From:** Lisa Barbounis  
<[lisa@barbounis.com](mailto:lisa@barbounis.com)>  
**Date:** July 12, 2019 at 9:59:12 AM EDT  
**To:** [delaney4044@gmail.com](mailto:delaney4044@gmail.com)  
**Subject:** Fwd:

----- Forwarded message -----

From: Lisa Barbounis  
<[lisa@barbounis.com](mailto:lisa@barbounis.com)>

# **EXHIBIT DD**

### Resume Submission Form

Please complete this form and paste your resume into the large fields on pages 3-5. When the form is complete, digitally sign and email the form to [ResumeService@mail.house.gov](mailto:ResumeService@mail.house.gov) or print, sign, and fax to 202-226-0837. We will use the information provided in this form to match your profile with House office resume requests. Please note that resumes are kept on file for 90 days.

#### Applicant Information

Name: Lisa Barbounis Date of Submission: 07/24/2019

Phone Number: ( 215 ) 910 - 2154 Alt Phone Number: (        )        -       

Email: lisabarbounis@gmail.com

Home State: Pennsylvania

☐ I am currently living in the Washington DC area ☒ I am willing to relocate to the Washington DC area

Please submit my attached resume (Select One):

☒ General Submission to Resume Bank  
☐ Open Vacancy Vacancy Number: \_\_\_\_\_ Title: \_\_\_\_\_

#### Applicant Information for Submission to Resume Bank

Political party preference:

☒ Republican Office ☐ Democratic Office ☐ No Preference

Type of position you are seeking:

☒ Full Time ☐ Part Time ☐ Intern

Do you have Capitol Hill experience?

☐ No ☒ Yes Position Title: Senior District Representative

For General Submission:

Select the position(s) you would like to be considered for (maximum 3 positions):

<input type="checkbox"/> Chief of Staff	<input type="checkbox"/> Legislative Correspondent	<input checked="" type="checkbox"/> Press Secretary
<input type="checkbox"/> District Director	<input type="checkbox"/> Legislative Director	<input type="checkbox"/> Receptionist/Staff Assistant
<input type="checkbox"/> Executive Assistant	<input type="checkbox"/> Office Manager	<input type="checkbox"/> System Administrator
<input checked="" type="checkbox"/> Legislative Assistant	<input type="checkbox"/> Press Aide	<input type="checkbox"/> Other: _____



Please use this space for any additional comments you wish to make.

As a communications professional with over six years of legislative experience, in both the public and private sector, I know my diverse skills and qualifications will make me an asset to the GOP team.

As you will see from the attached resume, I am a passionate conservative who has dedicated my career to forwarding the objectives of the Republican party and fighting for American interest both internationally and domestically. I have worked on legislation and messaging for two members of congress, a candidate for MEP in the United Kingdom, countless political campaigns and I thrive in the fast-paced environment of Congress and politics.

In addition to being flexible and responsive, I am achievement driven. Since entering my role as Director of Communication for the Middle East Forum I have increased our social media engagement by 32%. From June 2018 through June 2019, I helped place 1,128 articles by 56 experts in 97 outlets, from D.C.'s influential The Hill to the Wall Street Journal, from The Washington Times to Foreign Policy. Additionally, I arranged for 27 of our experts to be interviewed 92 times by 81 media outlets on both radio and television ranging from outlets like I24 News and Al Jazeera to Fox News. The connections that I have made and maintained with members of the press over the years may be one of my biggest contributions to effectively assist in forwarding the Member's objectives.

In closing, I am thrilled at the possibility of returning to Capitol Hill and would love the opportunity to meet with you and discuss the value that I can bring to your office. In addition to my resume, I have also included writing samples for your review.

Of course, a simple letter and resume never tells the entire story about any job applicant. That is why I am hopeful that if you have any questions, you will contact me at 215-910-2154 or lisabarbounis@gmail.com to either arrange a follow-up meeting or conversation.

Thank you in advance for your consideration.

Sincerely,

Lisa Reynolds Barbounis

Please initial both of the following:

LB \_\_\_\_\_ I acknowledge that the House of Representatives Vacancy Announcement and Placement Service maintains strict confidentiality with House employers regarding vacancies and cannot disclose information pertaining to the vacancies or referral of applicants and as a condition of registering with the House Vacancy Announcement and Placement Service, I agree not to seek this information.

LB \_\_\_\_\_ I certify that all of the foregoing information that I supplied in this submission form and resume is correct and complete. I UNDERSTAND THAT ANY FALSIFICATION OR OMISSION OF ANY INFORMATION CONSTITUTES GROUNDS FOR ANY HOUSE OF REPRESENTATIVES EMPLOYER TO NOT EMPLOY ME OR TO DISMISS ME FROM EMPLOYMENT.

Offices within the United States House of Representatives are equal opportunity employers.

Signature: Lisa Barbounis Digitally signed by Lisa Barbounis  
Date: 2019.07.24 14:38:20 -04'00' Date: 07/24/2019

**LISA BARBOUNIS**

2601 Pennsylvania Avenue, #1153  
Philadelphia, PA 19130  
lisabarbounis@gmail.com  
+1 215.910.2154

**SUMMARY**

Communication and public relations professional specializing in Middle East affairs. Responsible for advancing the Forum's project based and legislative initiatives by working with domestic and international media outlets, elected officials, advocacy groups, government agencies, and other nonprofits.

**EXPERIENCE**

**Middle East Forum**  
Philadelphia, PA

October 2017 – Present

*Director of Communications*

- Responsible for all external communication and public relations
- Represents the president and director, internally and externally, building relationships with political leaders, industry professionals, editors, journalists and donors
- Develops and delivers political communications strategy in Washington, D.C., Europe and Israel
- Ensures quality control of all information released including research, articles, messaging, social media, talking points and government official briefings
- Composes speeches, press releases, op-eds, and promotional material for special events
- Prepares policy memos including a policy proposal on UNRWA that was used by the Department of State in August 2018
- Oversees all media engagement and article placement for staff and fellows
- Identifies and secures speakers for events, conference calls and media hits.
- Advises and assists in identifying key influencers and facilitates the arrangement of Congressional, Administration, MP and MEP meetings and briefings
- Conducts briefings with government officials to discuss legislative initiatives
- Tracks domestic and Middle East legislation, news cycles, current events and political trends to provide background information for staff and for proper placement of fellow articles
- Creates strategic messaging through research and fact analysis
- Implemented and produced new project-based video program
- Increased traffic to website and social media reach by 32%

**U.S. House of Representatives – Rep. Ryan Costello (PA-06)**      January 2015 – October 2017  
Washington, D.C./West Chester, PA

*Senior Aide/Senior District Representative*

- In coordination with the District Director and Legislative Director, assisted with the development of district strategies and legislation that supported the member's policy goals
- Drafted one-minute speeches, Facebook posts, letters of support and constituent correspondence
- Tracked and researched federal legislation related to office and casework policy goals
- Served as a liaison between the federal government, non-profits, trade associations, advocacy groups and the Congressman's constituents on issues relevant to their interests and concerns

Developed, managed, and maintained strong relationships with Federal, State and local elected officials, and constituents

- Acted as a surrogate for the Congressman by conducting meetings with constituents and interest groups
- Attended and reported on Congressional briefings and events on behalf of the Congressman
- Organized, planned, and executed outreach events for 100+ guests
- Processed over 500 yearly casework inquiries specializing in Veterans Affairs, Immigration, Medicare, Affordable Healthcare Act, Social Security, Internal Revenue Service
- Oversaw and developed the district intern program
- Developed constituent service and intern procedural manuals
- Assured compliance with House Ethics

**U.S. House of Representatives - Rep. Jim Gerlach (PA-06)** January 2013 – January 2015  
Wyomissing, PA

*District Representative*

- Managed day-to-day operations in Berks County district office
- Acted as a liaison to federal, state, and local government agencies on behalf of constituents
- Handled casework focused on Social Security, Medicare, Veterans Affairs, Military, immigration, consumer affairs and IRS related issues
- Served as a liaison between the federal government, non-profits, trade associations, advocacy groups and the Congressman's constituents on issues relevant to their interests and concerns
- Tracked federal legislation related to policy goals

**EDUCATION**

**University of Pennsylvania, Philadelphia, PA** May 2012  
*College of Arts and Sciences, Bachelor of Arts in Philosophy Politics & Economics (PPE)*  
Concentration: Distributive Justice

**University of Pennsylvania, Philadelphia, PA** September 2016- Present  
*Master of Science in Behavior and Decision Sciences*  
Concentration: Behavioral Economics – Public Policy

**SPEAKING ENGAGEMENTS**

- Free Speech in the Age of Censorship – European parliament in Brussels, 2019
- The Chevra – Focus: Israel Advocacy, 2018
- Middle East Forum donor lunches, 2017-2019

**ADDITIONAL INFORMATION**

Volunteer:

- University of Pennsylvania Alumni Interview Program

Political:

- Director of Communication for a United Kingdom Candidate for Member of the European Parliament
- Special political advisor to UK political party
- Lou Barletta for Senate
- Ryan Costello for Congress
- Jim Gerlach for Congress

- Elected Republican Committee Person – Philadelphia
- Matthew Wolf for City Council - Philadelphia

Computer proficiency:

- Microsoft Outlook, Excel, Power Point, Word
- IQ, CRS
- Facebook, Twitter, Periscope, Instagram
- Salesforce, Nation Builder, Constant Contact
- Meltwater, Cision
- Legistorm
- Google Analytics
- MailChimp
- DropBox, Google GSuite
- Monday.com, Slack, Asana

# **EXHIBIT EE**



Hello?

Gregg?

Yes.

Hey, it's your anonymous source again.

Yes.

Not in agreement to any kind of recordings, right? Either your PA or wherever you're at. I'm not in agreement to that. Can you take me off speaker?

Okay. I ain't on speaker, I'm in a restaurant right now, in New York City.

Okay. Well, same applies, right?

Yeah, yeah, no. I'll just say the deal is the deal.

Okay. Question for you first of all, any of the information I'm giving you, is it going to help you at all or not?

Yeah, look, I haven't gotten any lawsuit yet.

Okay. That's surprising. I thought the paperwork was already there and that's why you were out. We're talking about New York for the Middle Eastern Forum, correct?

Yeah.

Yeah. I'm just letting you know, because if you haven't been served yet, because you're home right now on work leave, so I know we're both on the same page, but I'm just surprised that you hadn't been served yet.

No.

Okay. I'm going to run some stuff down, and again, if you write it down, it's fine. If you just want to absorb it, it's all up to you, I'm just letting you know. I told you about the woman down in DC.

Uh-huh (affirmative).

She's got a long sexual history past, so I don't know who you're... The attorneys you have that are working for you. I don't know what they can do, as far as what they will do, as far as their limits go, but even on a Friday or Saturday night, she's out on the prowl that would do anything as far as your case goes, as far as what she's claiming is referring to you. I know that she's the one that I guess got the ball rolling with the suit and everybody jumped in the suit because of her. I think they follow her lead. Some of them were encouraged to follow the lead on that.

The one woman that left, or she's leaving within the next month, actually joined in the suit and made up just to cash in. Some of them are already counting [inaudible 00:01:48] hope on first settlement, so they already spent some of their money. I know that for a fact.

Okay.

The other thing is the drug policy. Do you have a drug policy there or not?

Yeah, it's pretty clear.

Okay. My question to you is this, sooner the better because some of them have left. I don't think you can test the past employees, but the now employees that are there that are affecting you with this suit. I don't know how much longer you're going to wait to drug test them or what you have to do to test them. But if you wait, I don't know what you'll get, but if you do it soon, you're probably going to get something from somebody, out of probably who's left because I know some of them are still leaving.

We have to have a credible accusation or some kind of evidence that for instance, you would say, "These people were at this bar on this night," or, "They may have gone out in Philadelphia. We had an anonymous tip that they did X drug." You don't have to give specifics, but if you give me a date and where they were, then I would be able to use that to get them tested.

Well, let's put it this way. I know for a fact within the past three weeks that three of those four women involved in that lawsuit were out and about and they were doing drugs. They were smoking marijuana and they were sniffing some other medication that they're on. Is that clear enough for you, and now does that help you in any way?

Yeah, definitely. Can you just tell me...

They were at... In Philadelphia is where they were all at.

Could you say which medication that was?

They're on some kind of medication for, they all have this learning disability. Can I go that far, or do I really need to name it?

I get it.

You know what I'm saying? So I'm going give you two drugs that they take for this disability. They take Adderall or they'll take another medication for that. You know what I mean? I forget what the other one's called, but they take two medicines to focus. Well, those medicines are being abused, that and marijuana is being abused. That was three out of the four involved in that law, as of three weeks ago, and that was at a place in Philly they were all out and I was present at. So I don't want my name included in it, but that's definitely where it came from. That's where that came from firsthand.

And I can tell you that because I... I'm sorry, go ahead.

I was just going to say we tried to talk with them and say, "What is it that you want?" And they didn't want to talk to us. You're saying that they want a settlement, but we tried to speak to them and just got a response back. No.

They are all banking on a... I'm not going to lie to you. They're all banking on a large settlement. One of them has [inaudible 00:04:20] I guess whatever they think they're entitled to, and they're banking on the settlement quite clearly on that with the money they think they're going to get. Apparently the one girl they've already questioned is the girl I talked about in DC. They've questioned her morality.

If they were to follow it up, I think that would just level her suit, I mean, just chew holes in it as far as her sexual [inaudible 00:04:41] and what she does. The other thing [crosstalk 00:04:44].

...understood, sorry, I didn't mean to interrupt you.

No, no. The other thing is, I know you've been out, I don't know how many months it's been you've been out that you've been out for at least I think five or six months. Correct?

10.

10, so [inaudible 00:04:57] for 10 months now because the main boss is only in once a week, I think. Correct?

I don't know, I don't keep track of him.

In those 10 months. Yeah. Okay. In those 10 months, because there's no supervision in that office, they come and go as they please. They do what they want. There's no accountability. Half the time, there's not that many people there, if one, if you're lucky at that office. Because there's no supervision and they have the feeling that they can do work from home, do whatever they need to do. There's no one there.

So I don't know if that's the leverage for the suit also, but that's also, that comes into play as well.

They're just bragging about this? You know there's going on...

They just talk about it. That's the, like I said, I haven't been there. I haven't been where they work at, but that's the talk about that that's what they do because there's no supervision and I knew it was an extended period of time because they said that.

There's also, between me and you, [inaudible 00:05:54] you can tell whoever you want. There's just off the record between you as far as anonymous source, there was this girl, I don't know which girl. I believe it's the one down in DC. She ran into another girl who quit. I don't know how she did this, but she said she has a recording of her speaking about something that happened at your place with... Not your place, at your place of business with you, which was made up in order to strengthen their case and it was recorded. Whether it was recorded in a public place... Yeah, so you can see the extremes that they're going to in order to try to get at you and I just listen.

I am all for listening to certain bullshit, but when I know it's to extract money or go [inaudible 00:06:34] somebody in a position like yourself, it's not right. And a lot of them, like I said...

Can I just ask you why you're... I really appreciate this, but I have to ask, what's your motivation? I mean you're just a good guy? [inaudible 00:06:48].

I'm sorry, what's my motivation?

Yeah, you're just a good guy it seems like, but I mean...

Well I guess I don't want to... I don't like to see people taken advantage of, and this is a major, major advantage. You are in a position of power. These women have, for whatever reason, feel that they can try to take you out of that place of power. And I don't understand why you would, they would wreck a good thing but my whole thing is the morality of it. that you don't sue someone for something like this [inaudible 00:07:20] or put somebody through the mill if it's not right and it's not true.

And from what I can gather from what I've heard, it's not true. And some of the things, like I said, their outside lives of work would crumble their case only because of what I told you as far as drugs, the sexual history of the numerous, but especially the one down to DC. There's dirt, then that's just the case of a young girl also that works there. She's got a job that I think in a month she's leaving or something like that, where she's on the downside also. I don't know what your lure is, how they look at things, if they look at these people harder, that they dig more, they're going to find a lot more out than they thought was there.

And if it was me also, if you have a drug testing policy based on what I told you for three weeks ago in Philadelphia, it was at a, not a club but a high end dinner and then this was going on right afterwards. That should be enough to test. I don't know what your policies are.

I get it, I understand it. And there's no way we could ask you to come forward even if it was as an anonymous...

I can't because of what it's going to cost me. It's going to cost me a lot and...

I don't want you to be in that position. But I appreciate your, I appreciate it. I had to ask though, because I have a duty to the people.

No, I understand that. And I have no problem continuing to relay information to you, as long as I'm not recorded or asked. I'm not going to testify or anything like that, but as far as even giving depositions, I won't do that because I think I'm in a position to at least pass off information to you that can be useful. That can be useful for your case and that can be useful not to pay anyone out, send them money they're not entitled to at all, especially for something that's not true.

Well, I appreciate it [inaudible 00:08:58].

Are you there? Your phone's breaking up. Are you there. Gregg?

(silence)

# **EXHIBIT FF**

Page 1

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

THE MIDDLE EAST FORUM Civil Action No. 19-5697

Plaintiff,

vs.

LISA REYNOLDS-BARBOUNIS

Defendant.

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VIRTUAL VIDEOTAPED DEPOSITION of  
MATTHEW EBERT, Non-Party Witness in the above-titled  
action, held on June 30, 2020, commencing at  
approximately 1:13 p.m., before Eileen Mulvenna,  
CSR/RMR/CRR, Certified Shorthand Reporter,  
Registered Merit Reporter, Certified Realtime  
Reporter, and Notary Public of the State of New  
York.

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DIGITAL EVIDENCE GROUP  
1730 M Street, NW, Suite 812  
Washington, D.C. 20036  
(202) 232-0646



# **EXHIBIT GG**

lisa bar Cancel

**LB** Fwd: National Express confirmatio... **Inbox**  
Sent from my iPhone Begin forwarded  
message: From: tickets@nationalexpress...

All Results Filter

**LB** **Lisa Barbounis** 28/01/2019  
Fwd: National Express confirmatio... **Inbox**  
Sent from my iPhone Begin forwarded  
message: From: tickets@nationalexpress...

**LB** **Lisa Barbounis** 19/01/2019  
Fwd: Your Eurostar Ticket **Inbox**  
Sent from my iPhone Begin forwarded  
message: From: "Eurostar International L...

**LB** **Lisa Barbounis** 17/12/2018 **Inbox**  
Fwd: Your e-ticket receipt KAEXF...  
Sent from my iPhone Begin forwarded  
message: From: British Airways e-ticket...

**LB** **Lisa Barbounis** 16/12/2018  
Fwd: easyJet booking reference: E... **Inbox**  
Sent from my iPhone Begin forwarded  
message: From: "confirmation@easyJet....

**LB** **Lisa Barbounis** 10/10/2018



lisa bar Cancel

Contacts See All

LB Lisa Barbounis  
lisa.e.reynolds@gmail.com

Top Results

LB Lisa Barbounis 19/01/2019  
Fwd: Your Eurostar Ticket Inbox  
Sent from my iPhone Begin forwarded message: From: "Eurostar International L...

LB Lisa Barbounis 16/12/2018  
Fwd: easyJet booking reference: E... Inbox  
Sent from my iPhone Begin forwarded message: From: "confirmation@easyJet....

LB Lisa Barbounis 28/01/2019  
Fwd: National Express confirmatio... Inbox  
Sent from my iPhone Begin forwarded message: From: tickets@nationalexpress...

All Results Filter

LB Lisa Barbounis 28/01/2019  
Fwd: National Express confirmatio... Inbox  
Sent from my iPhone Begin forwarded

# EXHIBIT HH

[7/13/20, 11:05:04 AM] GR created group "MEF/Danny"  
[7/13/20, 11:05:04 AM] MEF/Danny: Messages to this group are now secured with end-to-end encryption.  
[7/13/20, 11:05:28 AM] GR added Jon Cavalier  
[7/13/20, 11:07:35 AM] Sid Gold: am i on  
[7/13/20, 11:07:45 AM] Jon Cavalier: As am I.  
[7/13/20, 11:07:50 AM] GR: Yes we're waiting for Danny to answer.  
[7/13/20, 11:08:22 AM] GR: Give me two minutes...  
[7/13/20, 11:11:21 AM] GR added Danny Tommo  
[7/13/20, 11:11:33 AM] GR: Hey Danny this is Gregg, Jon, and Sid  
[7/13/20, 11:11:41 AM] GR: We're going to call you in 2 minutes  
[7/13/20, 11:11:51 AM] GR: Can you see our messages?  
[7/13/20, 12:54:39 PM] Danny Tommo: Yes I can see them! Feel free to send me any more questions you have and I'll get what info I can. Thanks Danny  
[7/14/20, 4:03:03 PM] GR: Hi Danny, thanks again for speaking with us yesterday - I'm sorry it's taken so long to get back in touch - I'm sure you can imagine it was a lot to process for all of us  
[7/14/20, 4:04:28 PM] GR: We have a series of follow up questions that we'll share here - and Jon will share with you some protections for potential witnesses. We were thinking about her threats against you and Jon will explain to you why she can't do that and what would happen to her if she did again - it's a massive violation of both American and British law.  
[7/14/20, 4:09:33 PM] GR: Here's the notes and questions we have to follow up, again thank you for taking your time.

1. Can you please provide us with any response received to the email Russell Thomas sent to Lisa Barbounis ("LB") from Lisa or anyone else?
2. Are there any communications between you and Lisa or Jaz and Lisa that remain in your possession?
3. Any documentation or communication concerning or involving Lisa whatsoever. Especially plans re: Lisa's plans to move to UK...
4. Did Lisa specifically threaten you using her status as a congressional employee or US government official? (Very important question...)
5. Did you ever talk to a guy named Matt Ebert?
6. How do you know that Lisa removed Jax's voice mail from Gregg Roman's phone? Do you have any documentation of that?
7. Can you please identify as best you can recall the amounts, times and types of funds received from Lisa?
8. With respect to the above funds, how were those funds received? Paypal, Venmo, cash, etc.? Can you provide us with documentation of any kind?
9. Did she ever brag or talk about taking money from MEF or MEF donor information or other financially related information to help her ventures in the UK? Or anything else for that matter?

[7/14/20, 4:11:20 PM] GR: Here's the last item we thought we'd clarify: If you would you be willing to answer questions via zoom under oath so that we can use your information in defending against

and sharing the truth about Lisa? I'd like to make clear: You would not have to appear at trial – you could do this from the UK pretty soon and be done with it.

[7/14/20, 4:11:41 PM] GR: [REDACTED] can you please provide information about protection for witnesses under federal law?

[7/17/20, 4:05:56 PM] Danny Tommo: image omitted

[7/17/20, 4:05:56 PM] Danny Tommo: image omitted

[7/17/20, 4:28:16 PM] Danny Tommo: image omitted

[7/18/20, 8:12:52 AM] GR: Thank you, Danny. We can send a technician to your residence Monday or Tuesday to collect the phones to analyze them to see if we could get the data if you're ok with that.

[7/18/20, 9:23:59 AM] Danny Tommo: I'd want to get the phones fixed myself and to extract what information I can for you guys, because I have a lot of personal stuff on those phones that I don't really want anyone to see. Over the years of working with Tommy I need that to be done by myself to make sure none of that info goes walkies. I'm not saying I don't trust your guys, I just don't trust anyone.

But I'm happy to try and get them fixed, I'll pop to the phone shop on Monday.

[7/18/20, 9:58:31 AM] GR: What if we cover the costs of the extraction and fixing – you enter into the contract with the provider who does legal recovery so we can use it in court – and you retain ownership of all of the information as the client and only you decide what can be provided?

[7/18/20, 9:59:01 AM] GR: So basically you get the best of both worlds: You control and own the data AND we can use it as admissible in court?

[7/18/20, 9:59:09 AM] GR: Just an idea

[7/18/20, 10:02:03 AM] GR: (And by the way – seeing everything that's gone on in this case – information security is at a paramount these days; we'll do what we have to make you comfortable with the arrangement)

[7/18/20, 10:17:06 AM] Danny Tommo: Let's have a chat this evening about it if possible but I don't see why not!

[7/18/20, 3:01:10 PM] GR: 👍

[7/18/20, 3:51:44 PM] Danny Tommo: After speaking to Jaz, I think this is would be ok. Let's do it!

[7/18/20, 10:06:40 PM] GR: Great – the attorneys will set it up. The company (<https://altlaw.co.uk/about/>) will meet you in Southampton (or wherever you need) on Monday (tell us when/if you're free, I think they're coming from London) and pick up the phones.

[7/18/20, 10:07:51 PM] GR: Then, they'll use search terms related to the case, produce the evidence in a readable version – and share it with us and you – then you sign off on what you're willing to share.

[7/18/20, 10:08:20 PM] GR: Well limit our search to just what we spoke about last week.

[7/19/20, 5:37:36 AM] Danny Tommo: Ok sounds good to me.

[7/20/20, 7:29:40 AM] GR: Good morning/afternoon

[7/20/20, 7:31:28 AM] GR: Danny can I get your address/schedule for



today/tomorrow? Matthew Altass (the owner of the tech firm) will be in touch. Also is [REDACTED] your best number to reach you on?

[7/20/20, 7:56:00 AM] GR: I just got off the phone with him. I think you said you're in Southampton - so he's actually going to fly his private, single propeller plane down there tomorrow morning if you're free. He'll take an Uber or taxi from the Southampton airport to your house, pick it up, and then fly back to the laboratory in London. He'll run the imaging on the phone, apply search terms appropriate to the case, and actually be able to courier/mail you the phones back same day.

[7/20/20, 8:02:43 AM] Danny Tommo: Hi Gregg,

How will I know what info has been taken and what's going to be used?

Also how do I observe the info on the phones, if they come back in the same condition?

Im a little confused as to how in this situation, I'm in control of what info comes off the phones and how it's used.

Currently no legal protection that my content won't be viewed and used without my authority.

I need to know what info he has and view that info before I give any permission for it to be sent anywhere or seen by anyone except the technician himself.

Just a few question I need some help with if that's ok guys

[7/20/20, 8:23:42 AM] GR: Let me try to answer

[7/20/20, 8:24:21 AM] GR: 1. There's a data extraction log that comes from imaging of phones - it's a two step process; first image, then search.

[7/20/20, 8:26:01 AM] GR: 2. The image is the virtual version of the phones' contents. So if I typed in 'Lisa' into the search function of the phone it might come up with a text message, contact details, and so on. Same thing with the image. We can search it on the computer for terms associated with her.

[7/20/20, 8:26:41 AM] GR: 3. The firm has explicit instructions instructions to NOT hand over the images to anyone but YOU. Matt can guarantee this and our attorneys can draft a letter to this effect.

[7/20/20, 8:27:34 AM] GR: 4. The content which is extracted remains your property; and the ability to search that content will ONLY be with the tech.

[7/20/20, 8:28:23 AM] GR: 5. We can agree on search terms like her number, email address, and name. Those are the only things we're interested in. When those search terms are ran through the phone, they produce a 'hits list' with results.

[7/20/20, 8:28:50 AM] GR: 6. The hits list which produce communications with her are the ONLY thing we're interested in.

[7/20/20, 8:29:32 AM] GR: 7. You'll get the opportunity to review it

and ascent to its production when they're done and then we can use it over here.

[7/20/20, 8:30:04 AM] GR: 8. The remaining personal information and whatever else you don't wish to volunteer to hand over remains with you, exclusively under your control, and exclusively in your possession.

[7/20/20, 8:30:17 AM] GR: Does that make sense?

[7/20/20, 8:31:18 AM] GR: [REDACTED] can chime in if I've missed anything

[7/20/20, 8:33:03 AM] GR: Basically everything you're asking can be done.

[7/20/20, 8:39:16 AM] GR: Here is the software you'll use to review and approve the information: <https://help.relativity.com/9.2/Content/Relativity/Viewer/Viewer.htm#Viewer>

[7/20/20, 8:39:48 AM] GR: We'll send you a link so you can see what's produced from your phone.

[7/20/20, 8:40:20 AM] GR: The technician\* will send the link.


[7/20/20, 8:56:07 AM] GR: At the end of the day you're deciding what to turn over. Not anyone else.

[7/20/20, 9:06:06 AM] Danny Tommo: [REDACTED]

[REDACTED]

[7/20/20, 9:06:14 AM] Danny Tommo: Ok that makes sense!

[7/20/20, 10:54:23 AM] GR: Hey Danny, Matt called you and sent a text. That's out guy just to confirm.

[7/20/20, 11:23:52 AM] Danny Tommo: I've got the kids Gregg, best time to talk is after 6 mate it's too loud to have a convo I've got 3 of them under the age of 11 

[7/20/20, 11:58:32 AM] GR: Tell me about it!

[7/20/20, 11:58:39 AM] GR: I'll ask he call you after 6

[7/20/20, 11:58:52 AM] Sid Gold: k

[7/20/20, 2:06:51 PM] Danny Tommo: I'm sorry I can't tell you why but I can't be involved with this anymore. Please don't contact me again!

[7/20/20, 2:06:57 PM] Danny Tommo left